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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

THOMAS IGLESIAS, DAVID SALAZAR,
OLIVIA THURMAN, and BETHANY
TORBERT, Individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

FOR LIFE PRODUCTS, LLC,

Defendant.

**DECLARATION OF BRIAN S.
WILSON ON BEHALF OF
NONPARTY BARENTZ NORTH
AMERICA**

Judge: Hon. Thomas S. Hixson

No. 3:21-cv-01147-TSH

DECLARATION OF BRIAN S. WILSON ON BEHALF OF NONPARTY BARENTZ N.A.

**DECLARATION OF BRIAN S. WILSON ON BEHALF OF
NONPARTY DEFENDANT BARENTZ NORTH AMERICA**

I, Brian S. Wilson, hereby declare under the penalty of perjury:

1. I serve as the Chief Financial Officer for non-party Barentz North America (“Barentz”) and have been in this role for the last ten years. I have personal knowledge of the facts stated herein.

2. I make this declaration on behalf of non-party Barentz in response to the Court’s order dated August 14, 2024 (Docket No. 66) and Local Rule 79-5(f)(3), requiring Barentz to explain why the documents produced under subpoena to Plaintiffs in this matter must be kept under seal rather than subject to public disclosure.

3. Barentz’s Household Care, Industrial & Institutional Cleaning Group (collectively, the “HI&I Group”) makes, among other things, top-tier dishwashing, laundry, floor care, surface cleaners, pet care solutions, and vehicle care products.

4. The HI&I Group previously developed and made 22 Rejuvenate products including: (1) the Floor Cleaners; (2) Floor Restorers; (3) Cabinet & Furniture Cleaner; (4) Cabinet & Furniture Restorer; (5) Cabinet & Furniture Restorer; (6) Carpet & Upholstery Pet Stain Remover; (7) Carpet Cleaner; (8) Granite & Stone Cleaner; (9) Grout Deep Cleaner; (10) Luxury Vinyl Floor Cleaner; (11) Marble, Granite, and Stone Floor Cleaner; (12) Outdoor Color Restorer; (13) Restorer Wipes; (14) Shine Refresher; (15) Siding Restorer; (16) Soap Scum Restorer; (17) Stainless Steel Foam Cleaner & Polish; (18) Stone, Tile & Laminate Floor Cleaner; (19) Tile & Grout Everyday Cleaner; (20) Woods Floor Cleaner; (21) Woods Floor Restorer (Satin); and (22) Woods Floor Restorer (Gloss).

5. The formulations for these products are proprietary to Barentz, are confidential, and are considered trade secrets of Barentz. They were produced in response to the subpoena served by Plaintiffs on May 26, 2022. In connection with this production, Barentz designated these formulations as confidential pursuant to the Stipulated Protective Order entered in this matter on May 13, 2021 (Docket No. 19). To our knowledge, no party in this matter has objected to this designation. Nor would anyone have any legitimate basis to do so.

Signed by: Brian S. Wilson
By: Brian S. Wilson
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